

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MILLENNIAL PLASTIC SURGERY PLLC

Plaintiff,

v.

MEGHAN JAMES

Defendant.

Civil Action No.: 21-cv-9590

**[PROPOSED]
ORDER TO SHOW CAUSE FOR
EMERGENCY PRELIMINARY
RELIEF**

Upon the Complaint filed on November 18, 2021, and the Declaration of David Shokrian M.D. and Memorandum of Law filed herewith, it is hereby:

ORDERED, that Defendant Meghan James show cause before this Court, at the United States Courthouse located at 40 Foley Square, Courtroom ____, New York, New York 10007 on the ____ day of ____, 2021 at ____ A.M. or as soon thereafter as counsel can be heard, why this Court should not issue a an Order pursuant Fed. R. Civ. P. 65:

- (i) Directing Meghan James to cause the Instagram post dated November 16, 2021 referencing Millennial Plastic Surgery to be deleted, taken down, or otherwise unviewable by any third-party;
- (ii) Directing Meghan James to cause any other social media posts, known to Plaintiff or otherwise, to be deleted, taken down, or otherwise unviewable by any third-party;
- (iii) Enjoining Meghan James, posting, or causing any other person or account to post, on any social media or digital media platform, any content, statements, photographs, or other content, that directly or indirectly, explicitly or impliedly references Millennial Plastic Surgery, its employees, its affiliates, and/or its agents; and,

(iv) Any and all other relief that this Court deems just and proper.

ORDERED, that Defendant Meghan James shall serve opposition papers, if any, on Plaintiff's counsel by hand-delivery or electronically on Kevin Kehrli of Garson, Segal, Steinmetz, Fladgate LLP, 164 West 25th Street, Suite 11R, New York, New York 10001, at kk@gs2law.com on or by _____, 2021, and that any reply papers shall be served by Plaintiff on Defendant Meghan James by hand-delivery or electronically by email from which Defendant's counsel received opposition papers on or before _____, 2021.

ORDERED that service upon Meghan James via electronic mail to meghanj@icloud.com on or before _____, 2021, shall be deemed good and sufficient service thereof.

There have been no prior requests for the relief sought herein.

Defendant Meghan James is advised that failure to respond to the Order to Show Cause may be grounds for the granting the requested relief.

Dated: New York, New York

_____, 2021.

SO ORDERED:

The Honorable _____

United States District Judge